

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Andrea Ulecka and :
Michael Ulecka :
Debtor :
: Docket No. 18-16931-pmm
:
Midfirst Bank : Chapter 13
:
Movant :
Vs. :
:
Andrea Ulecka and :
Michael Ulecka :
Respondent :
And :
Scott F. Waterman, Esquire :
Additional Respondent :
:

RESPONSE TO MOTION FOR RELIEF FROM STAY

AND NOW, comes the Respondents, Andrea and Michael Ulecka, by and through their undersigned counsel, Michael J. McCrystal, Esquire and avers:

1. Admitted.
2. Admitted.

3. After reasonable investigation the answering respondent cannot admit or deny the truth or falsity of this averment and the same is deemed to be denied.
4. Denied as a conclusion of law to which no responsive pleading is required pursuant to the Federal Rules of Bankruptcy Procedure.
5. After reasonable investigation, the answering respondent cannot admit or deny the truth or falsity of this averment and the same is deemed to be denied.
6. Denied specifically that debtors have or will have made all required payments due to movant prior to a trial on the merits.
7. Denied as stated, further stated that at the time of a hearing on the merits debtor is or will be current on all payments due to movant.
8. Denied, this averment is specifically denied and it is averred to the contrary. By way of further answer, debtor alleges that it has made or will make each and every payment due under the Security Agreement and the Note since the filing of the bankruptcy case.
9. Denied, this averment is strictly denied.
10. Denied as a conclusion of law to which no responsive pleading is required pursuant to the Federal Rules of Bankruptcy Procedure.
11. Denied as a conclusion of law to which no responsive pleading is required pursuant to the Federal Rules of Bankruptcy Procedure.

WHEREFORE, Respondent prays this Honorable Court to deny the Motion for Relief from the Automatic Stay and for such other and further relief as this Honorable Court will deem just and equitable.

Respectfully submitted,

/s/ Michael J. McCrystal

Michael J. McCrystal, Esquire

Supreme Court ID No. 55064

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